

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V**

**DATE:** October 16, 2006

**SUBJECT:** OEPA's Comments  
Preliminary Remedial Objectives Technical Memorandum  
South Dayton Dump and Landfill

**FROM:** Dr. Luanne Vanderpool, Geologist  
AADS Section

**TO:** Karen Cibulskis  
Remedial Response Section #4

I have completed my review of OEPA's comments on the Preliminary Remedial Objectives Technical Memorandum for South Dayton Dump and Landfill. Generally the comments from Matt Justice are acceptable. The following are my comments for your consideration.

1. General Comment #1  
I agree.
2. General Comment #2  
I agree.
3. General Comment #3  
I agree.
4. Specific Comment #1  
Picky, but true.
5. Specific Comment #2  
I think the comment relates to the first full paragraph, not the last. I agree with the state that the language is unclear.
6. Specific Comment #3  
I think the comment relates to the first full paragraph, not the last. Perhaps "The FS will include *identification* and evaluation of alternatives".
7. Specific Comment #4, I agree
8. Specific Comment #5  
As long as it's an accurate reiteration, I do not object to include the language.
9. Specific Comment #6  
I need to get a copy of the reference. I don't know if I would go as far as OEPA to say remove all reference to two separate aquifers. Seems to me that there are areas where the till is laterally extensive locally and the lower portion of the aquifer acts confined. Perhaps

the comment to CRA should be to update the conceptual model to incorporate the conclusion of this study (that OEPA cites). Your August 7, 2006 version of this comment (#47) seems better crafted than OEPA's current version.

10. Specific Comment #7, I agree.
11. Specific Comment #8a relates to the Hydrogeology subsection on Page 33. I agree
12. Specific Comment #8b, I agree.
13. Specific Comment #8c, 8d, and 8e: I agree with the content of the comments but they are not really comments on the content of the document under review.
14. Specific Comment #9a and b,  
These are not really comments on the content of the document under review so much as recommendations for the RI. These are the same comments OEP gave us previously. Since we failed to "adequately" convey them previously, I guess they should be supported.
15. Specific Comment 10  
I propose some rephrasing: "This discussion proposes detection of "1,2-DCE" as evidence for the biodegradation of trichloroethene. Trichloroethene may potentially degrade into into three isomers: 1,1-dichloroethene, cis-1,2 dichloroethene, and trans-1,2 dichloroethene. *Of these, cis-1,2 dichloroethene is the predominant daughter product and its presence (at levels substantially higher than trans -1,2 dichloroethene) may be indicative of biodegradation. Please clarify whether the 1,2-DCE referenced is the cis isomer. The RI/FS planning documents need to distinguish between cis-1,2 dichloroethene and trans-1,2 dichloroethene.*
16. Specific Comment 11  
I agree with all but the last sentence of the first paragraph. I don't think it is realistic to say take out all reference to biodegradation. But it is important that the amount of biodegradation be evaluated as part of the RI/FS; not just to determine that some is occurring.
17. Specific Comments 12, 13, 14, and 15  
All are acceptable.

I hope these comments are of assistance to you. If you have questions or require further help, please call me at 3-9296.

cc. S. Padovani, Section Chief, AADS Section